

FILED

OCT 11 2024

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
AKRON

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

Case No.

JURY TRIAL DEMANDED

1 : 24 CV 01773

APRIL CLARK, Sui Juris

Plaintiff.

V.

Ashland University, Defendant
401 College Ave, Ashland, OH 44805

Dr. Theda Hostler
401 College Ave, Ashland, OH 44805

Dr. Jill Matthes Baxter
401 College Ave, Ashland, OH 44805

Nicole Stockland
401 College Ave, Ashland, OH 44805

Jennifer McElwain
401 College Ave, Ashland, OH 44805

Alexander Jordan
401 College Ave, Ashland, OH 44805

Dr. Carrie Keib
401 College Ave, Ashland, OH 44805

Larry Bunce
401 College Ave, Ashland, OH 44805

Rachael Hoffer

JUDGE RUIZ

MAG. JUDGE GREENBERG

401 College Ave, Ashland, OH 44805

Dr. Julie Jubak
401 College Ave, Ashland, OH 44805

Sidney Clarke
401 College Ave, Ashland, OH 44805

Juanita Reese
401 College Ave, Ashland, OH 44805

Andrea "Michelle" Ash
401 College Ave, Ashland, OH 44805

Janet Edwards
401 College Ave, Ashland, OH 44805

Katherine Weemhoff
401 College Ave, Ashland, OH 44805

Defendants.

COMPLAINT

I. INTRODUCTION

Plaintiff, April Clark, Sui Juris brings this action against Defendants Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea "Michelle" Ash, Janet Edwards, Katherine Weemhoff, and others, all employees and/or agents of ASHLAND UNIVERSITY, for engaging in a concerted and malicious campaign of corruptive pattern of practice, constitutional violations, civil rights discrimination, fraud and whistleblower retaliation.

Acting outside the scope of their official duties, Defendants willfully, knowingly, deliberately, and with malicious intent deprived Plaintiff of her fundamental, inherent, and unalienable rights protected under both the **Ohio State Constitution** and the **United States Constitution**. These actions include discrimination based on **race** and **disability**, retaliation for Plaintiff's whistleblowing activities, and involvement in fraudulent misrepresentation of college tuition fees and misuse of federal grant and loan funds.

Defendants' conduct not only violated Plaintiff's civil rights under **42 U.S. Code § 1983**, but also breached **whistleblower protection laws**, as well as engaged in fraudulent activities related to the misuse of federal funding, in violation of the **False Claims Act (31 U.S.C. §§ 3729 – 3733)**. Defendants further targeted Plaintiff in a coordinated effort to cover up these violations, by retaliating against Plaintiff for reporting the fraud, obstructing her education, and deliberately harming her academic standing.

Plaintiff seeks compensatory damages for the deprivation of her constitutional and statutory rights, punitive damages for Defendants' willful and malicious actions, and injunctive relief to prevent further harm.

II. JURISDICTION AND VENUE

Federal Jurisdiction U.S. District Court for the Northern District of Ohio is proper
Pursuant to 28 U.S.C. § 1331 Subject Matter Jurisdiction

28 U.S.C. § 1391 Venue Jurisdiction

Ashland University is physically located in Ohio and conducts business

Defendants work for Ashland University in Ohio and their actions tortious actions took place in Ohio

III. PARTIES

Plaintiff: APRIL CLARK, a resident of Columbus, Ohio

Defendants:

Ashland University, educational institution, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Dr. Theda Hostler, faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Dr. Jill Matthes Baxter, faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Nicole Stockland, employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Jennifer McElwain, employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Alexander Jordan, employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Dr. Carrie Keib, Dean and faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Larry Bunce, employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Rachael Hoffer, faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Dr. Julie Jubak, faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Sidney Clarke, student advisor of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Juanita Reese, faculty member of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Andrea "Michelle" Ash, employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Janet Edwards, financial aid employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

Katherine Weemhoff, financial aid employee of ASHLAND UNIVERSITY, participating in corruptive patterns of practice resulting in severe irreparable harms to Plaintiff

IV. FACTUAL ALLEGATIONS

1. Defendant, Ashland University financial aid program has historically frauded students and US Department of Education evidenced in fraudulent calculations and Plaintiff exposed fraudulent DNP FNP courses putting the US Department of Education at further risk of overpayment and Ashland University, et. al retaliated and dismissed Plaintiff from the program unlawfully following a strategic plot and scam to deny Plaintiff access and backtrack to delete courses and erase evidence.
2. Defendants are part of the group of individuals participating in organized crime, public corruption, whistleblower retaliation, gang stalking and RICO Racketeer Influenced and Corrupt Organizations Statute Title IX of the Organized Crime Control Act of 1970, at 18 U.S.C. §§ 1961-68.
3. Defendants dismissed Plaintiff from the Doctorate of Nursing Practice Family Nurse Practitioner Program under deception post
4. Plaintiff, April Clark, was a Doctorate of Nursing Practice Family Nurse Practitioner student at Ashland University and was enrolled in various courses paid for in part by federal government grant and loan funds Nursing Faculty Loan Program and US Department of Education FAFSA.
5. During her enrollment, Plaintiff became aware of significant fraudulent practices at Ashland University involving the misuse and misappropriation of federal grant and loan program funds. Specifically, the University, through its employees and agents, knowingly submitted false claims and reports to obtain federal funding that it was not entitled to, in violation of the **False Claims Act (31 U.S.C. §§ 3729 – 3733) and courses Advance Pathophysiology I and II AND Pharmacology I AND II.**
6. Due to a documented shortage of qualified nursing faculty at Ashland University, Defendants Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, and other university officials knowingly assigned unqualified faculty members to teach critical courses within the FNP program. These individuals were hired or assigned despite having little or no experience or expertise in advanced nursing practice, clinical training, or the specialized knowledge required to prepare students for certification as Family Nurse Practitioners.

7. The courses taught by these unqualified instructors were not designed to provide the necessary educational content and clinical experience required by accrediting bodies for FNP programs. Instead, these courses were fraudulently constructed and administered with the sole intent of maintaining enrollment and securing federal funds through the FAFSA and NFLP programs.
8. Defendants Ashland University and its administrators, including Dr. Carrie Keib, Jennifer McElwain, and Janet Edwards, were aware that these courses were not meeting the academic and clinical standards mandated for advanced nursing practice programs.
9. Defendants, nonetheless, continued to offer these fraudulent courses to students in order to secure federal grant and loan funding under false pretenses, in violation of the **False Claims Act (31 U.S.C. §§ 3729 – 3733)** and Janet Edwards, et. al had already accepted federal funding from the Nurse Faculty Loan Program and FAFSA.
10. Plaintiff was enrolled and participating in the fraudulent Pharmacology/Residency I “Preceptorship” course, verifiable by “Candy” of Third Street Community Clinic who enlightened Plaintiff that the Course and opportunity was actually a mere shadow experience of 50 hours total (split between a Nurse Practitioner and Pharmacist, whereby **no** true clinical hours exist and Ohio Pharmacy Board does not authorize and never has authorized Nursing students in any capacity to “shadow” nor “precept” with its Pharmacist as the course **REQUIRED and MANDATED with SOAP note assignment where no patient existed or access to Observation site guise as fraudulent “Clinical” site for federal grant and loan financial interest and gain under deception.**
11. Defendants further misrepresented to the U.S. Department of Education, accrediting bodies, and students that the FNP program met all educational standards and accreditation requirements. In reality, the program was knowingly compromised by faculty who were unqualified, resulting in fraudulent claims for federal financial aid and loan forgiveness funds through the Nurse Faculty Loan Program.
12. As a direct result of this fraudulent conduct, Plaintiff was ill-prepared for her **Advanced Practice certification exams**, and her professional development and future career as a Family Nurse Practitioner were jeopardized. The fraudulent courses undermined her ability to succeed academically and to meet the rigorous standards required to pass the APRN exams and obtain licensure.
13. Defendants’ actions were not merely negligent, but were part of a deliberate scheme to defraud the U.S. government, students, and accrediting bodies by maintaining the appearance of a functioning FNP program, while knowingly providing substandard education. Defendants acted with reckless disregard for the

future of the students in the program, prioritizing their financial gain over the education and career outcomes of their students.

14. Plaintiff, having paid tuition and fees for these fraudulent courses using federal grant and loan funds, was financially harmed and academically disadvantaged due to the fraudulent and inadequate instruction provided. Defendants' actions violated the **False Claims Act** and amounted to fraudulent misrepresentation, educational malpractice, and breach of contract.
15. In good faith, Plaintiff reported these fraudulent activities to the appropriate authorities, including Internal Complaint Department Larry Bunce AND Dean of Doctorate Nursing Program Carrie Keib, Higher Learning Commission (HLC) and US Department of Education FAFSA program, in accordance with her rights under federal **protection laws**.
16. In response to Plaintiff's report, Defendants Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea "Michelle" Ash, Janet Edwards, Katherine Weemhoff, et al., acting individually and collectively, began a coordinated campaign of retaliation against Plaintiff.
17. Defendants, acting outside the scope of their official duties and with malicious intent, took deliberate steps to undermine Plaintiff's academic standing by systematically withdrawing her from courses without her knowledge or consent. These courses had been fully paid for with federal government grant and loan funds, which Defendants sought to cover up by disguising their retaliatory actions as legitimate administrative decisions.
18. Defendants locked Plaintiff out of the university's online learning platform and student portal, which are essential for accessing coursework, submitting assignments, and receiving grades. This lockdown directly interfered with Plaintiff's ability to complete her academic work, making it appear as though she had failed the courses.
19. Defendant, Julie Jubak previously hindered, impinged and encroached upon Plaintiff educational success and opportunities related to IHI coursework and access to the materials necessitated to successfully complete the course and the certifications offered of the course, willfully, knowingly, deliberately, with ill will, wanton and malicious intent to harm Plaintiff whereby she ensured each and every other white student gained access to the Institute for healthcare improvement IHI coursework and neglected to pay the \$30 balance Plaintiff needed paid to access the courses as the initiation of the set up to dismiss Plaintiff from the Doctorate of Nursing Practice Family Nurse Practitioner Program organized crime conspiracy and collusion scheme

20. Defendant, Julie Jubak was reported for stealing case study educational materials from an entity offering faculty or Universities opportunity to contract for access and use of materials which intensified her motivation to collude with other Defendants in the unlawful, frivolous and fraudulent misrepresented dismissal of Plaintiff from the DNP FNP program.
21. Despite Plaintiff's attempts to contact university officials and resolve these access issues, Defendants refused to restore her access or acknowledge their wrongful actions. Instead, they falsely represented to university administration and external authorities that Plaintiff had failed her courses due to poor performance, when in reality, she had been unlawfully blocked from completing the coursework.
22. By withdrawing Plaintiff from courses without her knowledge and locking her out of the university portal, Defendants manipulated her academic records to create the false impression that she had failed to meet the requirements of her academic program. This misrepresentation was intended to discredit Plaintiff, justify her dismissal from the program, and conceal Defendants' ongoing fraudulent activities with respect to the misuse of federal funds.
23. Defendants' actions were not motivated by any legitimate academic concerns, but rather were a direct and deliberate retaliation for Plaintiff's whistleblowing regarding the university's fraudulent use of federal grant and loan funds. Defendants acted with the intent to harm Plaintiff's academic and professional future, while disguising their tortious and unlawful acts as legitimate administrative decisions.
24. As a result of Defendants' wrongful conduct, Plaintiff suffered substantial harm, including academic failure, damage to her reputation, financial loss, emotional distress, and a significant disruption to her educational and professional development. Plaintiff was forced to pay for courses she was unable to complete due to Defendants' retaliatory actions, and her standing in the academic community was unjustly compromised.
25. Defendants owed Plaintiff **DUTY OF CARE** acted in a manner that was below the **STANDARD OF CARE**

This factual allegation outlines how Ashland University and its employees assigned unqualified faculty to teach essential courses in the DNP FNP program due to a shortage of nursing faculty, leading to substandard education and placing students' careers at risk. It also describes how the university fraudulently misrepresented the quality of the program to secure federal financial aid and loan funds, thereby defrauding the U.S. government and harming the students. These corruptive patterns of practice are likely to continue without intervention of this Honorable Court.

V. CLAIMS FOR RELIEF

Plaintiff incorporates all preceding paragraphs 1-25. This **claim for relief** outlines how Defendants deliberately violated the Plaintiff's constitutional rights under **42 U.S. Code § 1983**, including acts of retaliation, discrimination, and unlawful interference with her education.

COUNT 1. Civil Rights Deprivation 42 U.S. Code § 1983:

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea "Michelle" Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 2. Whistleblower Retaliation:

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea "Michelle" Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 3. False Claims Act (31 U.S.C. §§ 3729 – 3733) Grant Fund Fraud

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 4. Targeting Harassment and Discrimination and Title VI of the Civil Rights Act of 1964 :

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 5. Fraudulent Misrepresentation

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that

warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 6. 15 U.S.C. § 45 (FTC Act – Unfair or Deceptive Practices):

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 7. College Tuition Fraud Higher Education Act of 1965 (HEA) and Consumer Protection and FTC Laws:

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process,

distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 8. Breach of Contract:

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted outside the scope of their duties by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

COUNT 9. Negligence:

Defendants **Dr. Theda Hostler, Dr. Jill Matthes Baxter, Nicole Stockland, Jennifer McElwain, Alexander Jordan, Dr. Carrie Keib, Larry Bunce, Rachael Hoffer, Dr. Julie Jubak, Sidney Clarke, Juanita Reese, Andrea “Michelle” Ash, Janet Edwards, Katherine Weemhoff, et. al** acted in a manner that was below the standard of care outside the scope of their duties in reckless disregard in breach of duty to Plaintiff by willfully, knowingly, deliberately, wantonly with malicious intent deprived Plaintiff Fundamental, Inherent, Unalienable, Ohio State Constitution and US Constitutional Rights, et. al that warrant a Constitutional Right Protected Civil Rights Discrimination Race and Disability, Whistleblower Retaliation, College Tuition and Federal Governmental Grant and Loan Funding Fraud claim. As a direct result, Plaintiff suffered loss of constitutional right, liberty, property and pursuit of happiness, mental and emotional terror, trauma, relentless fear, stress and anguish, loss of right to natural birth, inherent, unalienable, and fundamental rights, right to life, liberty, property, pursuit of happiness, due process, distress, PTSD, major depressive disorder, panic attacks, anxiety attacks and other irreparable and severe harms

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff requests that the Court enter judgment against the Defendants and grant the following relief:

1. Compensatory damages in an amount to be determined at trial.
2. Punitive damages to deter future misconduct.
3. Costs and attorney's fees payable to the Court by Defendant
4. Any other relief the Court deems just and proper.

DATED this October 5, 2024.

/s/April Clark, Sui Juris

CERTIFICATE OF SERVICE

The following was serviced to the following on October 5, 2024:

Ashland University, Defendant

401 College Ave, Ashland, OH 44805

Dr. Theda Hostler

401 College Ave, Ashland, OH 44805

Dr. Jill Matthes Baxter

401 College Ave, Ashland, OH 44805

Nicole Stockland

401 College Ave, Ashland, OH 44805

Jennifer McElwain

401 College Ave, Ashland, OH 44805

Alexander Jordan

401 College Ave, Ashland, OH 44805

Dr. Carrie Keib

401 College Ave, Ashland, OH 44805

Larry Bunce

401 College Ave, Ashland, OH 44805

Rachael Hoffer

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Dr. Julie Jubak

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Andrea "Michelle" Ash
401 College Ave, Ashland, OH 44805

Janet Edwards
401 College Ave, Ashland, OH 44805


Katherine Weemhoff
401 College Ave, Ashland, OH 44805

Service Sent October 5, 2024:

Jill Matthes Baxter <jmatthe2@ashland.edu>,
Andrea Ash <aash@ashland.edu>,
Julie Jubak <jlehrer@ashland.edu>,
Jennifer McElwain <jmcelwai@ashland.edu>,
Theda Hostetler <thostet3@ashland.edu>,
Joshua Montgomery <jmontgo6@ashland.edu>,
Rachel Hoffer <rhoffer@ashland.edu>,
Sidney Clarke <sfetch4@ashland.edu>,
Carrie Keib <ckeib@ashland.edu>,
"W. Juanita Reese Kline" <jkline6@ashland.edu>,
Larry Bunce <lbunce@ashland.edu>,
Janet Edwards <jedward8@ashland.edu>,
Student Accounts <busoff@ashland.edu>,
Katherine Weemhoff <kweemhof@ashland.edu>

April Clark
3037 Clairpoint Way
Columbus, Ohio 43227
alflexlegalnurseconsulting@gmail.com
614 778-4717

Plaintiff attests under penalty of perjury, the forgoing is factual, true and accurate accounting of events representative of meritorious and bona fide claims of injuries sustained as direct result of named Defendant(s) in the instant and Defendant(s), et. al named in Plaintiff filed cause of actions in this Court Defendants hereby accept this Statement as true and accurate in the event no ANSWER in rebut or refute with Affidavit of Truth Statement Under Penalty of Perjury by each Defendant in Individual Capacity is submitted **within 10 days** post receipt of Service of **COMPLAINT** filed in instant.


/s/April Clark, Sui Juris